

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
W.R. GRACE & CO., <i>et al.</i> ,	)	Case No. 01-1139 (JKF)
	)	Jointly Administered
	)	
Debtors.	)	Re: Docket No. 19540
	)	10/20/08 Agenda Item #10

**CERTIFICATION OF COUNSEL REGARDING ORDER  
(A) ESTABLISHING AUGUST 31, 2009 AS THE PROOF OF CLAIM BAR  
DATE FOR CANADIAN ZONOLITE ATTIC INSULATION PROPERTY  
DAMAGE CLAIMS AND (B) APPROVING THE RELATED PROOF OF CLAIM  
FORM, BAR DATE NOTICES, AND NOTICE PROGRAM**

1. On September 16, 2008, the Debtors filed a Motion for an Order (A) Establishing a Proof of Claim Bar Date for Canadian Zonolite Attic Insulation Property Claims, and (B) Approving the Related Proof of Claim Form, Bar Date Notices, and Notice Program (“Bar Date Motion”) [Dkt. No. 19540]. The Debtors received no objections to the Bar Date Motion, but received a request for certain minor changes to some of the bar date notice documents from the CCAA Representative Counsel who has been appointed to represent the interests of Canadian ZAI Claimants.

2. The Debtors have made the requested changes, and are submitting the revised documents attached hereto for the parties in interest and the Court to review in conjunction with the Bar Date Motion. The changes include the following:

a. **The Print Ad.** Some of the text was re-ordered so that the first sentence discusses homes in Canada with vermiculite/zonolite attic insulation to catch the

reader's attention, and information regarding the settlement fund is moved up to the top of the ad for the same reason. In addition, the word "Zonolite" was added to the heading and the text in the event that a reader might be more familiar with "Zonolite" than "Vermiculite." Finally, information was added to make clear that any personal injury claims related to ZAI will not be subject to the bar date, but instead will be handled separately by a U.S. personal injury trust.

b. **TV Spot.** The television spot was revised to ensure that "Zonolite Attic Insulation Property Claims" is prominently displayed throughout the spot.

c. **Notice to Known Claimants.** The notice to known claimants was revised to make clear that any personal injury claims related to ZAI will not be subject to the bar date, but instead will be handled separately by a U.S. personal injury trust. It was also revised to make clear that all notices will be translated into both French and Inuktitut, and that the proofs of claim can be filed in English or French. Lastly, the notice was revised to provide additional contact information regarding how to reach the CCAA Representative Counsel if individual claimants have questions.

d. **Instructions for Completing the Proof of Claim.** The instructions for completing the proof of claim were revised to make clear that any personal injury claims related to ZAI will not be subject to the bar date, but instead will be handled separately by a U.S. personal injury trust.

e. **Proposed Form of Order.** The proposed form of Order approving the Bar Date Motion has been modified to also seek approval of the "Cover Letter" described in paragraph 3 below.

3. In addition to the changes set forth above, the CCAA Representative Counsel has requested that the Debtors include a cover letter with the bar date materials that are mailed to known claimants and any claimants who request bar date materials (the "Cover Letter"). The Cover Letter attached as part of Exhibit B herein is intended to more fully explain to Canadian claimants that they might have a claim that is related to the U.S. bankruptcy proceedings. The Debtors have no objection to the inclusion of such letter.

4. Blacklines of the above-referenced bar date documents against the versions originally filed with the Court are annexed hereto at Exhibit A. Clean versions of the documents are annexed hereto at Exhibit B. The Proof of Claim Form and the Publication Notice Program<sup>1</sup> have not changed from those filed as exhibits to the Bar Date Motion; but are included herein in order for the Exhibits to the Order to be complete.

*[Remainder of page intentionally left blank]*

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<sup>1</sup> As a point of clarity, the Debtors acknowledge that the website information discussed in the Publication Notice Program at page 21 of that document will be translated into French and Inuktitut.

5. The Debtors request that this Certification and Exhibits be considered and approved in conjunction with the Bar Date Motion at the hearing on October 20, 2008.

October 17, 2008

Respectfully submitted,

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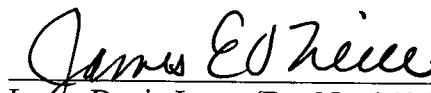
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